

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
Baltimore Division**

In Re: Felisa Hiteshew

Case No. 17-21422
Chapter 13

OBJECTION BY SECURED CREDITOR TO PROPOSED PLAN

Comes now the secured creditor, Bank of America, N.A., which holds a Deed of Trust secured by the Debtor's real property at 5904 Old Frederick Rd, Catonsville, Maryland 21228, by and through its attorney, Kyle J. Moulding, Esq., and objects to the proposed plan and to confirmation and for reason therefore states as follows:

1. The Debtor has proposed a plan which includes a total payment of \$29,000.00 for arrearages owed to McCabe, Weisberg & Conway, LLC which is the law firm that represents Bank of America, N.A. which remains the actual creditor.

2. The secured creditor Bank of America, N.A. anticipates filing a Proof of Claim with pre-petition arrearages due in the approximate amount of \$29,378.18.

3. The plan as proposed by the Debtor would therefore be insufficient to pay the claim of Bank of America, N.A..

4. Pursuant to a previous request from the Court to so advise it and the parties, Counsel for the Creditor does not intend to appear in Court regarding this Objection

Wherefore the Secured Creditor prays this court to enter an Order

1. Denying confirmation of the proposed Chapter 13 Plan, or alternatively
2. Modifying the Chapter 13 Plan to provide for payment in full of the Claim filed

by the secured creditor, or alternatively

3. For such other and further relief as the Court deems appropriate.

Respectfully submitted:

/s/ Kyle J. Moulding, Esq. (kmg)
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CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of October, 2017 I reviewed the Court's CM/ECF system and it reports that an electronic copy of the foregoing pleading will be served electronically by the Court's CM/ECF system on the following:

Robert S. Thomas, II
300 E Joppa Road, Suite 409
Towson, Maryland 21286
ECF@ch13balt.com

Douglas Robert Gorius
511B Eastern Blvd.
Baltimore, Maryland 21221
dgorius.esq@comcast.net

I hereby further certify that on the 6th day of October, 2017, a copy of the foregoing pleading was also mailed first class mail, postage prepaid to:

Felisa Hiteshew
5054 Summer Day Lane
Columbia, Maryland 21044
(Via U.S Mail)

/s/ Kyle J. Moulding, Esq.
Kyle J. Moulding, Esq.